

Exhibit 2

UNITED STATES DISTRICT COURT

for the

Central District of California



In re Application of Barkley & Associates Inc.

Plaintiff

v.
Quizlet Inc.

Defendant

Civil Action No. 2:25-mc-00010-WLH-E

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

Quizlet, Inc. c/o INCORPORATING SERVICES, LTD.
3500 South DuPont Hwy, Dover, DE 19901

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment A

Place: 310 N Westlake Blvd STE 120, Westlake Village, CA
91362

Date and Time:
08/15/2025 10:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 07/11/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Barkley & Associates, Inc., a California Corporation, who issues or requests this subpoena, are:
Brian Tamsut, 310 N Westlake Blvd Suite 120, Westlake Village, CA 91362, btamsut@socalip.com, (805) 230-1350

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

ATTACHMENT A

REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS

To the Responding Party and to its attorney of record:

Barkley & Associates, Inc. demands that you produce and permit the inspection and copying by or on behalf of itself and/or tangible things in definitions and categories described below:

1. "Barkley" means plaintiff Barkley & Associates, Inc.

2. "Quizlet, Inc.," "Quizlet," "Defendant," "You," or "Your," refer to Defendant Quizlet, Inc., its parents, subsidiaries, divisions, successors, affiliates, including any present or former officers or directors, trustees, employees, agents, representatives, attorneys, or all other people acting or purporting to act on its behalf.

3. "Document" has the broadest meaning accorded to it by FED. R. CIV. P. 34 and FED. R. EVID. 1001.

4. "Electronically stored information" and "ESI" means electronically stored information stored in any medium from which information can be obtained either directly or after translation by the responding party into a reasonably usable form.

5. If any ESI requires translation to make it understandable because of the format of the ESI, the program under which the ESI was created or because of abbreviations in the ESI, You must translate the ESI to make it understandable to Barkley.

6. "Lawsuit" means this underlying lawsuit, Barkley & Associates, Inc. v. Quizlet, Inc., et al., United States District Court Central District of California, No. 2:24-cv-05964 WLH(Ex).

7. This request is limited to documents between January 1, 2016 and the present date.

8. Insofar as a document request asks for a document showing information

1 about Quizlet seller or supplier, and You have documents showing different
2 information for the seller or supplier, you must produce documents showing the dif-
3 ferent information.

4 9. If a document requested to be produced also has contact information about
5 an End User, you must produce documents showing that information.

6 10. If a document request seeks documents about the contact information for
7 person/entity, you must show the name, address (street address, city, state and ZIP
8 code), email address and telephone number of that person/entity and if that person or
9 entity is not a United States resident, provide a document showing as complete for-
10 eign address you have.

11 REQUEST FOR DOCUMENTS OR THINGS

12
13 For each of the users listed in Schedule A Barkley hereby requests documents
14 that show:

- 15 1. The full legal name;
- 16 2. Email address;
- 17 3. Telephone number;
- 18 4. Home and billing address.

19 Schedule A

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21 mallorymcgee97
22 erin_congleton8
23 lauren_cellini3
24 rogersclay
25 randitjheld
26 samanthaapinoo
27 krystal_michelle8
28 dirty_sar
dnp_rrt_medic
rozaggs
lorenze462
ashley_mcperson6
ashlong3

1 nandirmrz
2 bonniebunnni
3 Karen_Taylor274
4 bsimm13
5 Magarcia214
6 Rosie_Cruz3
7 Roberto_Kuria
8 Ltellis8441
9 briana_mucklow
10 Annemarie_Tutor
11 hemodynamix
12 ccancino19956
13 Kemps05
14 kaylad1331
15 ssanjorge
16 makroe0959
17 fanfan_han
18 kay_kitty_socorro
19 alicia_swindler2
20 Michelle_Powers53
21 Maggie_Mwai
22 skostan
23 rlb275
24 Gordon217
25 Melissa_Moore723
26 jgarc144
27 Allie_Carter19
28 palaharvard
Melissa_Kucukarslan7
mgmuller95
bluesonem
Crhiannonj82
PATRICK_MAINA1
ramvmallari
lacrosse8768
roselinemonde20
Jane_Theuri
thediddy_kong
gabie_jones12
stacimiddleton
Allison_Kroll
allyrosenberg10
hmartin014
pandinhaexpress
molly_nelson44
nurse_girl
johny_boi1

1 CruellaDevill3
2 ambp
3 trish_gill_allmon
4 hopesumandea
5 m22r25cnmf
6 mthompson4867
7 Mariette_Franklin
8 Devon_Miller20
9 Jennifer_Gonzales
10 Eliana6855
11 josh_brown34
12 TMZ777
13 keeganwood
14 skb488
15 Yasmin_Franco5
16 samantha_luttrell
17 dalimar_rodriguez3
18 jamielynnelliott
19 karimikelvin92
20 DBSk7
21 LJewelsAPN
22 Carole_Wilkinson
23 s_silvis
24 casey_baine1
25 kit_kat_k8
26 Rcheshire
27 srg3880
28 ashleymnelson7
erinwhitehorne
brookerackley13
Lindsay_Cerchio2
michaelawest1
StudyBuddyNPC
chloekemp7
Tamirm97
betsybennett03
emcmahan2
Maya_C60
sfscoggins
corumal
eleanormayfield
kathryn_oelfke
krista_scott8
eleanordoody_
lreames
brandy_teague7
gwAPO1925

1 Grace_Solipaca
ajorda52
2 Ben_Erickson41
nelson_muriithi5
3 amos_Blackfire
SIRANTOS
4 Emily_Wambura
mvelez9982
5 tibby_25
6 ryancoryan4326
amanda_weiss9
7 kanutabz82
8 Jon_Valderrama
Hn-ndirangu
9 frankoriamia
bancymuthoni885
10 Dennoh_K
courtneycaputoo
11 gichuki75
12 denniswambui150
francis_thuo
13 lopachinski
Mose003
14 gradeboost77
15 IAN068018
trinanjeri0
16 Amos_Kiragu
Daniel_Gichobi
17 yob98mk
18 edson_209
jamesmuthomi64
19 jwirrie
Moureen_Karimi
20 karimiwilliam69
Zawadi182
21 waciramwangi246
22 Wilfred_Mburu4
Yamabolt
23 Gianinne_Alvarez3
shanique_coke
24 karceneaux2
25 Taylor_Culley28
Abby_Kolbow8
26 Ellen_Martini4
anyarangel
27 jdcallaghan12
28 klmazza12

Emily_Malfitano8
alexandra_ecker
xgrmmtnhr54
Rebecca_DeTeresa
moureen_wanjohi
Kylian1398
Wanyeki_Dan
edu_findrantez7
joyce_wambugu18
Averie_Fuller52
JackiB96
Adn2017Tif
Stefani_Cain
Phinta
djbb96
lorilynn1190
torishael
Miriamkim33
Kyalokyema
jdec44
Alex_Kamau45
Dani_Cummings3
jaclynes14
nrdilly
irene_ung9
user9832
awesomeTrinityLo
annacfay7
John_Matha
Marquita_Mckissick
katiegoodwinart
Cara85340
denis_kinyua5
maggie_loibl
faith_rivers_bolding
Kagwirah_Ke
Putin_Mee
cheruharriss
Lillohmwai
jasonmitcham8
newton591
Mudryk_gotyou
Daniel_Bundi8
leanna7897
hellodocs
Brianna_Whitehead5
crchris2

annwambui3932
Mwikuua
Jay_Son16
alvinburtoncda
upgrade73
quizlette53336876
allenjillian12
userhelperi
sb8379
nmdonaTI
sofiterry
davong18_lawstuff

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